

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
DANVILLE DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 4:20-CR-00018
)	
ALAN JAX WAGONER)	

**UNITED STATES MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE TO MOTION TO DISMISS INDICTMENT**

Comes now the United States of America, by counsel, and respectfully requests an extension of time in which to file a response to Defendant's Motion to Dismiss Indictment. In support of its motion, the Government states as follows:

1. A pre-trial conference is scheduled for Wednesday, October 20, 2021. Dkt. No. 117.
2. The defendant filed a Motion to Dismiss Indictment on October 8, 2021. Dkt. No 130.
3. Lead counsel on this investigation has been out of the office the week of October 11, 2021 and has not had a full opportunity to formulate a formal response to this motion.
4. Counsel for the Unites States needs additional time to internally review and prepare a response to this motion.
5. Accordingly, the government respectfully requests an extension of time until October 19, 2021 to file its Response to the Motion to Dismiss Indictment.

WHEREFORE, the Government respectfully requests this Court grant an extension of time to submit a response in the above-captioned case.

Respectfully submitted,

CHRISTOPHER R. KAVANAUGH.
United States Attorney

s/ Matthew M. Miller
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CERTIFICATE OF SERVICE

Undersigned counsel hereby certifies that a copy of the foregoing Motion for Extension of Time to File Response to Motion to Dismiss Indictment was served on all parties of record via the Court's CM/ECF system on October 14, 2021.

s/ Matthew M. Miller
Matthew M. Miller
Assistant United States Attorney